



E. EVANS WOHLFORTH, JR.

666 Third Avenue, 20th floor
New York, NY 10017-4132
Main (212) 451-2900
Fax (212) 451-2999
ewohlforth@rc.com
Direct (212) 451-2954

Admitted in New York
and New Jersey

September 8, 2023

By ECF

Hon. Cathy L. Waldor, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Courthouse
50 Walnut Street, Room 4040
Newark, NJ 07102

Re: *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC*
(Case No. 2:22-cv-02632-JMV-CLW)

Your Honor:

This law firm in association with Selendy Gay Elsberg PLLC represents defendant Save On SP, LLC (“SaveOnSP”) in the above-captioned matter. In Your Honor’s Letter Order of August 18, 2023, [ECF No. 145] (the “Letter Order”), the Court granted in part and denied in part without prejudice our Motion of June 16, 2023 [ECF No. 117]. The documents that were the object of our Motion were provisionally under seal at ECF No. 109. The Court granted the Motion with respect to the exhibit attaching a patient list, and denied that portion of the Motion that sought to seal the parties’ joint cover letter. The Letter Order required SaveOnSP to file a new version of the exhibit in which only the patient list and not the cover letter to which it is attached is under seal, and denied it without prejudice with respect to SaveOnSP’s proposed redactions to the parties’ joint letter.

In the Letter Order, Your Honor kindly permitted SaveOnSP until today to make a supplemental filing in further support of that portion of the Motion denied without prejudice. We write to inform the Court that SaveOnSP no longer seeks to permanently seal that portion of ECF No. 109. We will not, therefore, be making the supplemental submission. Instead, as required by the Letter Order, we have filed a new, redacted version of ECF No. 109-1 in which only the patient list (not the cover letter) has been redacted. The redacted version has been filed as ECF No. 152.



September 8, 2023

Page 2

Finally, I call to Your Honor's attention that the Court tolled a number of deadlines for other motions to seal certain documents [ECF Nos. 116, 119, 122-123, and 131] pending the ultimate resolution of SaveOnSP's Motion to Seal [ECF 117]. That Motion is now resolved. SaveOnSP respectfully requests, therefore, that those deadlines now be set for 14 days from the date of this letter. JJHCS' counsel consents to this request.

We thank Your Honor for your kind consideration of this letter and its request. Please do not hesitate to have the Court's staff contact me with any questions or concerns or if we may be of any service to the Court whatsoever.

Respectfully submitted,

s/ E. Evans Wohlforth, Jr.

Cc: All Counsel (via ECF)